

WILMERHALE

November 10, 2016

Alan E. Schoenfeld

VIA ECF

+1 212 937 7294 (t)  
+1 212 230 8888 (f)  
alan.schoenfeld@wilmerhale.com

The Honorable Jesse M. Furman  
United States District Court  
for the Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: *John Doe v. Columbia University and Trustees of Columbia University*  
No. 14-cv-3573 (JMF)

Dear Judge Furman,

The parties in the above-referenced matter write jointly pursuant to this Court's order dated November 1, 2016. The parties submit herewith a Civil Case Management Plan and Scheduling Order for the Court's consideration, and address below the items identified in the Court's order setting the initial pretrial conference.

*A brief description of any discovery that has already taken place and of any discovery that is necessary for the parties to engage in meaningful settlement negotiations.*

No discovery has taken place at this time. The parties have engaged a private mediator and will participate in mediation on January 6, 2017. The parties do not believe that any discovery is necessary for them to engage in meaningful settlement negotiations.

*A brief description of any further motions that the parties anticipate filing.*

As the Court is aware, Defendants moved to dismiss Plaintiff's state-law claims, and the Court declined to exercise supplemental jurisdiction over those claims after dismissing the Title IX claim. The court of appeals vacated this Court's dismissal of the complaint. Defendants' arguments with respect to dismissal of the state-law claims have yet to be addressed by this Court on the merits.

The parties may file motions for summary judgment following discovery. The parties do not anticipate filing any other motions at this time.

*Any other information that the parties believe may assist the Court in advancing the case to settlement or trial, including, but not limited to, a description of any dispositive issue or novel issue raised by the case.*

The parties do not believe any such information exists.

WILMERHALE

Hon. Jesse M. Furman  
November 10, 2016  
Page 2

The parties' proposed Civil Case Management Plan and Scheduling Order is attached to this letter. The parties will appear before the Court for the initial pretrial conference on November 15, 2016, but are of course available to address these or any other matters should the Court have questions or concerns.

Respectfully submitted,

/s/ Alan E. Schoenfeld  
Alan E. Schoenfeld

cc: All Counsel of Record (by email and ECF)